

# **EXHIBIT A**

**From:** [Danninger, Timothy](#)  
**To:** [Jeffrey L. Haberman](#); [Jonathan R. Gdanski](#)  
**Cc:** [Folio, Ryan M.](#); [Luk, Arthur](#); [Jonathan R. Gdanski](#); [Kouba, David E.](#); [Massaro, John](#); [Guzman, Michael J.](#); [Schwarz, David L.](#); [LeMieux, George](#); [Wilson, Gabrielle](#); [\\*Eugene@boersch-illovsky.com](mailto:*Eugene@boersch-illovsky.com); [Christopher J. Esbrook](#); [Robert Scher](#); [ccorrell@kslaw.com](mailto:ccorrell@kslaw.com); [David Pustilnik](#); [\\*jkramer@orrick.com](mailto:*jkramer@orrick.com); [Seaton, Lauren](#); [Langner, Bailey](#); [agivens@kslaw.com](mailto:agivens@kslaw.com); [Mitchell Malachowski](#); [jsell@tysonmendes.com](mailto:jsell@tysonmendes.com); [doconnor@oconlaw.com](mailto:doconnor@oconlaw.com); [\\*odonnell@wtotrial.com](mailto:*odonnell@wtotrial.com); [\\*Ronk@wtotrial.com](mailto:*Ronk@wtotrial.com); [dgervase@provisionlaw.com](mailto:dgervase@provisionlaw.com)  
**Subject:** RE: JLI - McKnight  
**Date:** Monday, May 13, 2024 12:36:13 PM  
**Attachments:** [3881189\\_3\\_2024\\_05\\_XX\\_McKnight - Defendants First Set of RFP's to Plaintiffs.docx](#)

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Jeff/Jon:

Attached are the proposed requests to produce. Please let us know if you will consent to this limited discovery in advance of the discovery deposition we have been discussing. You will note that we removed requests for text messages based on your representation of the earlier agreement regarding text messages of plaintiffs and defendants (text messages are not included in the definitions).

If you agree to these requests, or some agreeable modified requests, we will work with you on timing and process for production.

Let us know if you have any questions or would like to discuss.

We plan to include this in our discovery letter if the parties cannot agree. If the parties agree, we will indicate to the court that the parties have met and conferred and agreed on a limited set of requests to produce in advance of the discovery deposition.

Tim

---

**From:** Jeffrey L. Haberman <[JHaberman@schlesingerlaw.com](mailto:JHaberman@schlesingerlaw.com)>  
**Sent:** Monday, May 13, 2024 11:27 AM  
**To:** Jonathan R. Gdanski <[Jonathan@schlesingerlawoffices.com](mailto:Jonathan@schlesingerlawoffices.com)>; Danninger, Timothy <[TDanninger@gunster.com](mailto:TDanninger@gunster.com)>  
**Cc:** Folio, Ryan M. <[rfolio@kellogghansen.com](mailto:rfolio@kellogghansen.com)>; Luk, Arthur <[Arthur.Luk@arnoldporter.com](mailto:Arthur.Luk@arnoldporter.com)>; Jonathan R. Gdanski <[JGdanski@schlesingerlaw.com](mailto:JGdanski@schlesingerlaw.com)>; Kouba, David E. <[David.Kouba@arnoldporter.com](mailto:David.Kouba@arnoldporter.com)>; Massaro, John <[John.Massaro@arnoldporter.com](mailto:John.Massaro@arnoldporter.com)>; Guzman, Michael J. <[mguzman@kellogghansen.com](mailto:mguzman@kellogghansen.com)>; Schwarz, David L. <[dschwarz@kellogghansen.com](mailto:dschwarz@kellogghansen.com)>; LeMieux, George <[GLEmieux@gunster.com](mailto:GLEmieux@gunster.com)>; Wilson, Gabrielle <[GWilson@gunster.com](mailto:GWilson@gunster.com)>  
**Subject:** Re: JLI - McKnight

Tim-

Is the discovery letter supposed to be done jointly, with each side putting in its respective position? Or do we each file our own letter? Please advise. If it's to be joint, we will have our letter to you soon.

Thanks

**Jeffrey Haberman**

Attorney

1212 Southeast Third Avenue



Fort Lauderdale, Florida 33316  
O (954) 467-8800

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**From:** Jonathan R. Gdanski <[Jonathan@schlesingerlawoffices.com](mailto:Jonathan@schlesingerlawoffices.com)>  
**Sent:** Friday, May 10, 2024 3:54:50 AM  
**To:** Danninger, Timothy <[TDanninger@gunster.com](mailto:TDanninger@gunster.com)>  
**Cc:** Jeffrey L. Haberman <[JHaberman@schlesingerlaw.com](mailto:JHaberman@schlesingerlaw.com)>; Folio, Ryan M. <[rfolio@kellogghansen.com](mailto:rfolio@kellogghansen.com)>; Luk, Arthur <[Arthur.Luk@arnoldporter.com](mailto:Arthur.Luk@arnoldporter.com)>; Jonathan R. Gdanski <[JGdanski@schlesingerlaw.com](mailto:JGdanski@schlesingerlaw.com)>; Kouba, David E. <[David.Kouba@arnoldporter.com](mailto:David.Kouba@arnoldporter.com)>; Massaro, John <[John.Massaro@arnoldporter.com](mailto:John.Massaro@arnoldporter.com)>; Guzman, Michael J. <[mguzman@kellogghansen.com](mailto:mguzman@kellogghansen.com)>; Schwarz, David L. <[dschwarz@kellogghansen.com](mailto:dschwarz@kellogghansen.com)>; LeMieux, George <[GLEmieux@gunster.com](mailto:GLEmieux@gunster.com)>; Wilson, Gabrielle <[GWilson@gunster.com](mailto:GWilson@gunster.com)>  
**Subject:** Re: JLI - McKnight

Please see below for comments and responses.



**Jonathan Gdanski**

Attorney  
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O (954) 467-8800

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On May 10, 2024, at 8:18 AM, Danninger, Timothy <[TDanninger@gunster.com](mailto:TDanninger@gunster.com)> wrote:

Jeff:

We disagree with the unreasonable restrictions you have put on Mr. McKnight's depositions.

First, 5 hours is reasonable for the discovery deposition. It is our first deposition of Mr. McKnight and will be attended by at least 6 distinct defendant parties. We have repeatedly agreed that we will accommodate Mr. McKnight as necessary in order to complete the deposition.

We are not on the same page. So we will have to reflect our respective positions in the letter brief to the judge.

Second, within 7 days is unreasonable for the time between the depositions. As stated, we believe that the preservation deposition should begin no less than 7 days and no more than 14 days after the discovery deposition. This will allow the parties time to receive the transcript from the discovery deposition and to prepare for the preservation deposition.

We are OK with the preservation deposition taking place between seven and 14 days.

Third, it is patently unreasonable for you to refuse to agree that the preservation deposition will not be used until all parties have had the opportunity to question Mr. McKnight within the confines set by the court or by our agreement. Based on Scott's representation to the court, this seems to be a possibility and is a reasonable standard for the parties to agree to.

Our position on this issue is that all sides are reserving all rights. No one has to make a commitment or take a position now. Therefore there should be no part of anybody's position that is patently unreasonable.

Fourth, 7 hours is reasonable for the preservation deposition in light of the number of parties who will question the witness – possibly in lieu of trial testimony. At trial, all parties would be able to cross-examine Mr. McKnight and that will be no different here. Your attempt to limit the deposition to three hours – the same as you question is patently unreasonable.

Fifth, we are still waiting to hear from you regarding limited written discovery to Mr. McKnight in advance of the discovery deposition.

Please let us know specifically what you are thinking about. If you could let us know what that is today, we would appreciate it. Some of it may be objectionable some of it may not.

My understanding is that at least as it relates to text messages and other messaging applications, there was an agreement not to request that information from the founders or investors in exchange for that not being requested from the personal injury plaintiffs.

Please advise as soon as possible if you will agree to the above.

Tim

---

**From:** Jeffrey L. Haberman <[JHaberman@schlesingerlaw.com](mailto:JHaberman@schlesingerlaw.com)>  
**Sent:** Thursday, May 9, 2024 3:59 PM  
**To:** Danninger, Timothy <[TDanninger@gunster.com](mailto:TDanninger@gunster.com)>; Folio, Ryan M. <[rfolio@kellogghansen.com](mailto:rfolio@kellogghansen.com)>; Luk, Arthur <[Arthur.Luk@arnoldporter.com](mailto:Arthur.Luk@arnoldporter.com)>; Jonathan R. Gdanski <[Jonathan@schlesingerlawoffices.com](mailto:Jonathan@schlesingerlawoffices.com)>  
**Cc:** Jonathan R. Gdanski <[JGdanski@schlesingerlaw.com](mailto:JGdanski@schlesingerlaw.com)>; Kouba, David E. <[David.Kouba@arnoldporter.com](mailto:David.Kouba@arnoldporter.com)>; Massaro, John <[John.Massaro@arnoldporter.com](mailto:John.Massaro@arnoldporter.com)>; Guzman, Michael J. <[mguzman@kellogghansen.com](mailto:mguzman@kellogghansen.com)>; Schwarz, David L. <[dschwarz@kellogghansen.com](mailto:dschwarz@kellogghansen.com)>; LeMieux, George <[GLEMieux@gunster.com](mailto:GLEMieux@gunster.com)>; Wilson, Gabrielle <[GWilson@gunster.com](mailto:GWilson@gunster.com)>  
**Subject:** Re: JLI - McKnight

Good afternoon,

On behalf of Walker McKnight, we propose the following regarding the preservation of his testimony. Mr. McKnight will be made available for a deposition before his preservation deposition. Defendants shall have up to two hours to examine Mr. McKnight in the initial deposition. Plaintiff's counsel may conduct a re-direct examination as they deem appropriate. After the completion of the initial deposition, Mr. McKnight will be made available for a preservation deposition within seven business days. Plaintiff's counsel shall have up to three hours to conduct a direct examination. Defendants shall have up to three hours to conduct a cross-examination. Re-direct and re-cross may proceed as necessary.

Please let us know if you agree and/or provide us with your position.

Thanks,  
Jeff

**Jeffrey Haberman**  
Attorney  
1212 Southeast Third Avenue

<image002.jpg>

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O (954) 467-8800

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---

**From:** Danninger, Timothy <[TDanninger@gunster.com](mailto:TDanninger@gunster.com)>

**Sent:** Tuesday, May 7, 2024 10:14 PM

**To:** Folio, Ryan M. <[rfolio@kellogghansen.com](mailto:rfolio@kellogghansen.com)>; Luk, Arthur

<[Arthur.Luk@arnoldporter.com](mailto:Arthur.Luk@arnoldporter.com)>; Jonathan R. Gdanski

<[Jonathan@schlesingerlawoffices.com](mailto:Jonathan@schlesingerlawoffices.com)>

**Cc:** Jonathan R. Gdanski <[JGdanski@schlesingerlaw.com](mailto:JGdanski@schlesingerlaw.com)>; Jeffrey L. Haberman

<[JHaberma@schlesingerlaw.com](mailto:JHaberma@schlesingerlaw.com)>; Kouba, David E.

<[David.Kouba@arnoldporter.com](mailto:David.Kouba@arnoldporter.com)>; Massaro, John

<[John.Massaro@arnoldporter.com](mailto:John.Massaro@arnoldporter.com)>; Guzman, Michael J.

<[mguzman@kellogghansen.com](mailto:mguzman@kellogghansen.com)>; Schwarz, David L. <[dschwarz@kellogghansen.com](mailto:dschwarz@kellogghansen.com)>;

LeMieux, George <[GLEmieux@gunster.com](mailto:GLEmieux@gunster.com)>; Wilson, Gabrielle

<[GWilson@gunster.com](mailto:GWilson@gunster.com)>

**Subject:** RE: JLI - McKnight

I will send a zoom.

---

**From:** Folio, Ryan M. <[rfolio@kellogghansen.com](mailto:rfolio@kellogghansen.com)>

**Sent:** Tuesday, May 7, 2024 10:11 PM

**To:** Danninger, Timothy <[TDanninger@gunster.com](mailto:TDanninger@gunster.com)>; Luk, Arthur

<[Arthur.Luk@arnoldporter.com](mailto:Arthur.Luk@arnoldporter.com)>; Jonathan R. Gdanski

<[Jonathan@schlesingerlawoffices.com](mailto:Jonathan@schlesingerlawoffices.com)>

**Cc:** Jonathan R. Gdanski <[JGdanski@schlesingerlaw.com](mailto:JGdanski@schlesingerlaw.com)>; Jeffrey L. Haberman

<[JHaberma@schlesingerlaw.com](mailto:JHaberma@schlesingerlaw.com)>; Kouba, David E.

<[David.Kouba@arnoldporter.com](mailto:David.Kouba@arnoldporter.com)>; Massaro, John

<[John.Massaro@arnoldporter.com](mailto:John.Massaro@arnoldporter.com)>; Guzman, Michael J.

<[mguzman@kellogghansen.com](mailto:mguzman@kellogghansen.com)>; Schwarz, David L. <[dschwarz@kellogghansen.com](mailto:dschwarz@kellogghansen.com)>;

LeMieux, George <[GLEmieux@gunster.com](mailto:GLEmieux@gunster.com)>; Wilson, Gabrielle

<[GWilson@gunster.com](mailto:GWilson@gunster.com)>

**Subject:** RE: JLI - McKnight

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---

Yes. Thank you.

**Ryan M. Folio**

*Associate*

**KELLOGG, HANSEN, TODD, FIGEL & FREDERICK, PLLC**

1615 M Street, NW | Suite 400 | Washington, DC 20036

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---

**From:** Danninger, Timothy <[TDanninger@gunster.com](mailto:TDanninger@gunster.com)>

**Sent:** Tuesday, May 7, 2024 10:10 PM

**To:** Luk, Arthur <[Arthur.Luk@arnoldporter.com](mailto:Arthur.Luk@arnoldporter.com)>; Jonathan R. Gdanski <[Jonathan@schlesingerlawoffices.com](mailto:Jonathan@schlesingerlawoffices.com)>

**Cc:** Folio, Ryan M. <[rfolio@kellogghansen.com](mailto:rfolio@kellogghansen.com)>; Jonathan R. Gdanski <[JGdanski@schlesingerlaw.com](mailto:JGdanski@schlesingerlaw.com)>; Jeffrey L. Haberman <[JHaberman@schlesingerlaw.com](mailto:JHaberman@schlesingerlaw.com)>; Kouba, David E. <[David.Kouba@arnoldporter.com](mailto:David.Kouba@arnoldporter.com)>; Massaro, John <[John.Massaro@arnoldporter.com](mailto:John.Massaro@arnoldporter.com)>; Guzman, Michael J. <[mguzman@kellogghansen.com](mailto:mguzman@kellogghansen.com)>; Schwarz, David L. <[dschwarz@kellogghansen.com](mailto:dschwarz@kellogghansen.com)>; LeMieux, George <[GLEmieux@gunster.com](mailto:GLEmieux@gunster.com)>; Wilson, Gabrielle <[GWilson@gunster.com](mailto:GWilson@gunster.com)>

**Subject:** [EXTERNAL] RE: JLI - McKnight

Ryan – noon works for all of us, does it work for you?

---

**From:** Luk, Arthur <[Arthur.Luk@arnoldporter.com](mailto:Arthur.Luk@arnoldporter.com)>

**Sent:** Tuesday, May 7, 2024 9:03 PM

**To:** Jonathan R. Gdanski <[Jonathan@schlesingerlawoffices.com](mailto:Jonathan@schlesingerlawoffices.com)>; Danninger, Timothy <[TDanninger@gunster.com](mailto:TDanninger@gunster.com)>

**Cc:** Folio, Ryan M. <[rfolio@kellogghansen.com](mailto:rfolio@kellogghansen.com)>; Jonathan R. Gdanski <[JGdanski@schlesingerlaw.com](mailto:JGdanski@schlesingerlaw.com)>; Jeffrey L. Haberman <[JHaberman@schlesingerlaw.com](mailto:JHaberman@schlesingerlaw.com)>; Kouba, David E. <[David.Kouba@arnoldporter.com](mailto:David.Kouba@arnoldporter.com)>; Massaro, John <[John.Massaro@arnoldporter.com](mailto:John.Massaro@arnoldporter.com)>; Guzman, Michael J. <[mguzman@kellogghansen.com](mailto:mguzman@kellogghansen.com)>; Schwarz, David L. <[dschwarz@kellogghansen.com](mailto:dschwarz@kellogghansen.com)>; LeMieux, George <[GLEmieux@gunster.com](mailto:GLEmieux@gunster.com)>; Wilson, Gabrielle <[GWilson@gunster.com](mailto:GWilson@gunster.com)>

**Subject:** RE: JLI - McKnight

We can as well, thanks.

---

**From:** Jonathan R. Gdanski <[Jonathan@schlesingerlawoffices.com](mailto:Jonathan@schlesingerlawoffices.com)>

**Sent:** Tuesday, May 7, 2024 4:30 PM

**To:** Danninger, Timothy <[TDanninger@gunster.com](mailto:TDanninger@gunster.com)>

**Cc:** Luk, Arthur <[Arthur.Luk@arnoldporter.com](mailto:Arthur.Luk@arnoldporter.com)>; Folio, Ryan M. <[rfolio@kellogghansen.com](mailto:rfolio@kellogghansen.com)>; Jonathan R. Gdanski <[JGdanski@schlesingerlaw.com](mailto:JGdanski@schlesingerlaw.com)>; Jeffrey L. Haberman <[JHaberman@schlesingerlaw.com](mailto:JHaberman@schlesingerlaw.com)>; Kouba, David E. <[David.Kouba@arnoldporter.com](mailto:David.Kouba@arnoldporter.com)>; Massaro, John <[John.Massaro@arnoldporter.com](mailto:John.Massaro@arnoldporter.com)>; Guzman, Michael J. <[mguzman@kellogghansen.com](mailto:mguzman@kellogghansen.com)>; Schwarz, David L. <[dschwarz@kellogghansen.com](mailto:dschwarz@kellogghansen.com)>; LeMieux, George <[GLEMieux@gunster.com](mailto:GLEMieux@gunster.com)>; Wilson, Gabrielle <[GWilson@gunster.com](mailto:GWilson@gunster.com)>

**Subject:** Re: JLI - McKnight

External E-mail

We can make noon eastern work. Tx

<image003.jpg>

**Jonathan Gdanski**

Attorney

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On May 7, 2024, at 11:21 PM, Danninger, Timothy  
<[TDanninger@gunster.com](mailto:TDanninger@gunster.com)> wrote:

Jon/Jeff:

Are you or someone from your team available any time tomorrow afternoon? I am tied up until noon also.

Tim

---

**From:** Luk, Arthur <[Arthur.Luk@arnoldporter.com](mailto:Arthur.Luk@arnoldporter.com)>

**Sent:** Tuesday, May 7, 2024 3:12 PM

**To:** Jonathan R. Gdanski <[Jonathan@schlesingerlawoffices.com](mailto:Jonathan@schlesingerlawoffices.com)>; Folio, Ryan M. <[rfolio@kellogghansen.com](mailto:rfolio@kellogghansen.com)>



**Cc:** Danninger, Timothy <[TDanninger@gunster.com](mailto:TDanninger@gunster.com)>; Jonathan R. Gdanski <[JGdanski@schlesingerlaw.com](mailto:JGdanski@schlesingerlaw.com)>; Jeffrey L. Haberman <[JHaberman@schlesingerlaw.com](mailto:JHaberman@schlesingerlaw.com)>; Kouba, David E. <[David.Kouba@arnoldporter.com](mailto:David.Kouba@arnoldporter.com)>; Massaro, John <[John.Massaro@arnoldporter.com](mailto:John.Massaro@arnoldporter.com)>; Guzman, Michael J. <[mguzman@kellogghansen.com](mailto:mguzman@kellogghansen.com)>; Schwarz, David L. <[dschwarz@kellogghansen.com](mailto:dschwarz@kellogghansen.com)>; LeMieux, George <[GLEmieux@gunster.com](mailto:GLEmieux@gunster.com)>; Wilson, Gabrielle <[GWilson@gunster.com](mailto:GWilson@gunster.com)>  
**Subject:** RE: JLI - McKnight

Like Ryan, afternoon would be better for us as we have some conflicts tomorrow morning.

---

**From:** Jonathan R. Gdanski <[Jonathan@schlesingerlawoffices.com](mailto:Jonathan@schlesingerlawoffices.com)>  
**Sent:** Tuesday, May 7, 2024 2:01 PM  
**To:** Folio, Ryan M. <[rfolio@kellogghansen.com](mailto:rfolio@kellogghansen.com)>  
**Cc:** Danninger, Timothy <[TDanninger@gunster.com](mailto:TDanninger@gunster.com)>; Jonathan R. Gdanski <[JGdanski@schlesingerlaw.com](mailto:JGdanski@schlesingerlaw.com)>; Jeffrey L. Haberman <[JHaberman@schlesingerlaw.com](mailto:JHaberman@schlesingerlaw.com)>; Kouba, David E. <[David.Kouba@arnoldporter.com](mailto:David.Kouba@arnoldporter.com)>; Massaro, John <[John.Massaro@arnoldporter.com](mailto:John.Massaro@arnoldporter.com)>; Luk, Arthur <[Arthur.Luk@arnoldporter.com](mailto:Arthur.Luk@arnoldporter.com)>; Guzman, Michael J. <[mguzman@kellogghansen.com](mailto:mguzman@kellogghansen.com)>; Schwarz, David L. <[dschwarz@kellogghansen.com](mailto:dschwarz@kellogghansen.com)>; LeMieux, George <[GLEmieux@gunster.com](mailto:GLEmieux@gunster.com)>; Wilson, Gabrielle <[GWilson@gunster.com](mailto:GWilson@gunster.com)>  
**Subject:** Re: JLI - McKnight

External E-mail

I can do between 10-12 eastern. Tx

<image001.jpg>

**Jonathan Gdanski**

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On May 7, 2024, at 5:13 PM, Folio, Ryan M.  
<[rfolio@kelloggghansen.com](mailto:rfolio@kelloggghansen.com)> wrote:

I can be flexible, but afternoon is preferable. Thanks Tim.

**Ryan M. Folio**

*Associate*

**KELLOGG, HANSEN, TODD, FIGEL & FREDERICK, PLLC**

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---

**From:** Danninger, Timothy <[TDanninger@gunster.com](mailto:TDanninger@gunster.com)>

**Sent:** Monday, May 6, 2024 10:25 PM

**To:** [jgdanski@schlesingerlaw.com](mailto:jgdanski@schlesingerlaw.com);

[jhaberman@schlesingerlaw.com](mailto:jhaberman@schlesingerlaw.com);

[\\*david.kouba@arnoldporter.com](mailto:*david.kouba@arnoldporter.com)

<[David.Kouba@arnoldporter.com](mailto:David.Kouba@arnoldporter.com)>;

[\\*john.massaro@arnoldporter.com](mailto:*john.massaro@arnoldporter.com)

<[John.Massaro@arnoldporter.com](mailto:John.Massaro@arnoldporter.com)>; Luk, Arthur

<[Arthur.Luk@arnoldporter.com](mailto:Arthur.Luk@arnoldporter.com)>; Guzman, Michael J.

<[mguzman@kelloggghansen.com](mailto:mguzman@kelloggghansen.com)>; Folio, Ryan M.

<[rfolio@kelloggghansen.com](mailto:rfolio@kelloggghansen.com)>; Schwarz, David L.

<[dschwarz@kelloggghansen.com](mailto:dschwarz@kelloggghansen.com)>

**Cc:** LeMieux, George <[GLEMieux@gunster.com](mailto:GLEMieux@gunster.com)>; Wilson,

Gabrielle <[GWilson@gunster.com](mailto:GWilson@gunster.com)>

**Subject:** [EXTERNAL] JLI - McKnight

We need to set a time Wednesday for a meet and confer to discuss the McKnight deposition. Please respond to this email with your team's availability – one person per party, please.

Tim

**Timothy S. Danninger** | Shareholder

**Gunster, Yoakley & Stewart, P.A.**

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[Counsel block]

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

IN RE: JUUL LABS, INC., MARKETING,  
SALES PRACTICES, AND PRODUCTS  
LIABILITY LITIGATION

**Case No. 19-md-02913-WHO**

**DEFENDANTS’  
FIRST SET OF REQUESTS FOR  
PRODUCTION OF DOCUMENTS TO  
PLAINTIFFS WALKER MCKNIGHT,  
DAVID MCKNIGHT, AND CANDACE  
MCKNIGHT**

This Document Relates to:

*Walker McKnight et al. v. JUUL Labs, Inc., et  
al.*, Case No. 20-cv-02600-WHO

Pursuant to Rule 34 of the Federal Rules of Civil Procedure, Defendants, through undersigned counsel, propound the following First Set of Requests for Production of Documents to Plaintiffs Walker McKnight, David McKnight, and Candace McKnight. Responses to these Requests for Production, or objections in lieu thereof, shall be served within 14 days after service of this document. Defendants expressly reserve the right to serve additional document requests at a later time.

### DEFINITIONS

1. “Action” means *Walker McKnight et al. v. Juul Labs, Inc., et al.*, Case No. 20-cv-02600-WHO.

2. “Cannabis” or “Cannabis Products” means any product, including but not limited to smoking, vaping, or food products, containing tetrahydrocannabinol or cannabidiol.

3. “Communication” or “Communications” means any written or oral disclosure, transfer, or exchange of information, data, or opinion, however made, and shall mean, but is not limited to, any transmittal and/or receipt of information, whether such was formal or informal, and specifically include conversations in person, telephone conversations, letters, memoranda, electronic mail, and social media posts or messages.

4. The terms “Concern” or “Concerning,” in addition to their natural meaning, shall also mean reflecting, constituting, containing, pertaining, supporting, referring, indicating, showing, evidencing, describing, discussing, mentioning, bearing upon, comprising, and relating.

5. “Defendants” shall be construed to include JLI, Altria Group, Inc., Philip Morris USA, Inc., Altria Client Services LLC, Altria Distribution Company, and Altria Enterprises LLC, Adam Bowen, Nicholas Pritzker, Riaz Valani, Hoyoung Huh, James Monsees, Mother Murphy’s Laboratories Inc., Alternative Ingredients, Inc, eLiquitech, Inc, Tobacco Technologies, Inc., Chevron Corp., Eby-Brown Company, LLC, Core-Mark Holding Company, Inc., 7-Eleven, Inc., and Wawa, Inc.

6. “Document” or “Documents” shall be construed to the fullest extent permitted under the Federal Rules of Civil Procedure and is used in the broadest sense, meaning all written,

1 printed, typed, recorded or graphic matter, however produced or reproduced, of every kind and  
2 description, in whatever form (e.g., final and draft versions) in Your actual or constructive  
3 possession, custody, care, or control, including but not limited to all writings, correspondence,  
4 emails, letters, notes, agendas, memoranda, inter-office Communications, reports, projects,  
5 analyses, working papers, charts, debit or credit card or bank account statements, receipts,  
6 calendars, appointment books, diaries, journals, drawings, graphs, photographs, notes of telephone  
7 conversations or meetings, extracts or summaries of other Documents, computer files, computer  
8 printouts, data stored on computer storage disks, hard drives, or networks, social media posts or  
9 communications, videos, data compilations from which information can be obtained or can be  
10 translated through detection devices into reasonably useable form, or any other tangible thing. The  
11 term “Document” or “Documents” shall include not only originals but also any copies or  
12 reproductions of all such written, printed, typed, recorded, or graphic matter upon which notations  
13 in writing, print, or otherwise have been made that do not appear in the originals. In addition to the  
14 items in the foregoing list, any comment, notation, strike-out, interlineation, or other alterations  
15 appearing on any Document or any copy of any Document, and not a part of the original text of  
16 such Document, is considered a separate Document, as is any draft or preliminary form of any  
17 Document.

18 7. “ENDS” or “ENDS Products” shall mean any electronic nicotine delivery system,  
19 including but not limited to e-cigarettes, personal vaporizers, vape pens, e-cigars, e-hookahs,  
20 vaping devices, mod systems, nicotine e-liquids or pod systems, or any other product that heats a  
21 composition to produce an aerosol that contains nicotine that is inhaled by the user.

22 8. The terms “Identify” or “Identifying,” when used as to a Person or entity, means to  
23 state their full name, address, date of birth, and telephone numbers; when used in reference to a  
24 documents means to provide the Bates number associated with it or, if no Bates number is  
25 applicable, to state whether such document exists, the name and a detailed description of the  
26 document’s contents, the date of the document, and the current custodian and location of the  
27 document; when used in reference to a location means to state the address of the location and, if  
28 applicable, the name of the location; otherwise means to provide information that specifically

1 identifies the information or item requested; and/or means to provide any other specific  
2 information requested.

3 9. “Illegal Drug” or “Illegal Drugs” shall mean any illicit drug in the United States,  
4 including, but not limited to cocaine, crack, inhalants, hallucinogens, heroin, methamphetamine,  
5 or prescription-type drugs used non-medically.

6 10. The terms “Include,” “Includes,” and “Including” mean “including but not limited  
7 to” or “including without limitation.”

8 11. “JLI” shall mean Defendant Juul Labs, Inc., as well as any parent, affiliate,  
9 subsidiary or business segment, predecessor, successor or assignee, principal, operating division,  
10 present or former owners, employees, officers, directors, agents, representatives, attorneys,  
11 accountants, distributors, and any other Person acting on behalf of or under the direction,  
12 authorization, or control of JLI.

13 12. “JUUL Product” or “JUUL Products” means any ENDS Product manufactured,  
14 designed, advertised, sold, or distributed by JLI, including JUUL devices and JUUL pods.

15 13. “Non-JLI Defendants” shall be construed to include all Defendants except for JLI.

16 14. “Person” or “Persons” includes any natural person, custodian of records, firm,  
17 association, partnership, joint venture, corporation, related or associated company, trust, or other  
18 form of legal entity.

19 15. “Tobacco Product” or “Tobacco Products” refers to any product made or derived  
20 from tobacco that is intended for human consumption, including any component, part, or  
21 accessory of a Tobacco Product (except for raw materials other than tobacco used in  
22 manufacturing a component, part, or accessory of a tobacco product).

23 16. “You,” “Your,” and “Plaintiffs” shall mean the Plaintiffs in the Action and each of  
24 his or her employees, agents, present and former attorneys, and any other Person acting on his or  
25 her behalf, including guardians.

26 17. As used herein, the singular shall include the plural and the present tense shall  
27 include the past tense. The words “and” and “or” shall be construed disjunctively or conjunctively  
28 as necessary to bring within the scope of a Request all documents or things that might otherwise

1 be construed to be outside its scope. The use of the term “the” shall not be construed as limiting  
2 the scope of any Request.

3 18. In keeping with the Court’s Order Re: Discovery of Electronically Stored  
4 Information, Dkt. No. 323, all technical terms shall follow or be defined by *The Sedona*  
5 *Conference Glossary: E-Discovery and Digital Information Management*.

## 6 INSTRUCTIONS

7 1. If any Document responsive to these Requests was, but no longer is, in Your  
8 possession, or subject to Your custody or control, or in existence, state in writing whether: (a) it is  
9 missing or lost; (b) it has been destroyed; (c) it has been transferred voluntarily or involuntarily to  
10 others; or (d) it has been disposed of otherwise. In each instance, explain the circumstances  
11 surrounding such disposition and identify the Person(s) directing or authorizing the same and the  
12 date(s) thereof. Identify each Document by listing its author, his or her address, type (e.g., letter,  
13 memorandum, telegram, chart, photograph), date, subject matter, present location(s) and  
14 custodian(s), and state whether the Document (or a copy) is still in existence.

15 2. If You claim that any Document requested is protected by the attorney-client  
16 privilege, the work product doctrine, or any other privilege, the protocol outlined in Case  
17 Management Order No. 4: 502(D) and Privileged Materials Order is applicable, including any  
18 privilege log obligations.

19 3. These Requests for Production are continuing requests. If, after producing the  
20 requested Documents, You obtain or become aware of any additional Documents responsive to  
21 these Requests for Production, You are required to produce such additional Documents.

## 22 REQUESTS FOR PRODUCTION

### 23 REQUEST NO. 1

24 All Documents and Communications consulted in completing or identified in Your  
25 Plaintiff Fact Sheet.

### 26 REQUEST NO. 2

27 All Documents and Communications consulted in completing or identified in Your April 3,  
28 2024, Declaration in this Action.



1 **REQUEST NO. 3**

2 All Communications Concerning Walker McKnight's alleged JUUL Product use, ENDS  
3 Product use, Tobacco Product use, other inhaled product use (Including inhaled Cannabis  
4 Products), alcohol use, Illegal Drug use, or illicit use of legal drugs, Your alleged damages, or  
5 Your allegations in the Action.

6 **REQUEST NO. 4**

7 All photographs, films, movies, or video recordings of Walker McKnight using Tobacco  
8 Products, ENDS Products, JUUL Products, other inhaled products (Including inhaled Cannabis  
9 Products), alcohol, Illegal Drugs, or legal drugs illicitly.

10 **REQUEST NO. 5**

11 All Documents reflecting the basis of Your allegations against each Non-JLI Defendant,  
12 including Documents sufficient to identify each of Your interactions with each of the Non-JLI  
13 Defendants.

14  
15 DATED: May [REDACTED], 2024

Respectfully Submitted,

16  
17 By: /s/[REDACTED]

[REDACTED]